

**THE STATE OF NEW HAMPSHIRE**

GRAFTON, SS

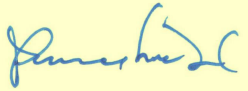
SUPERIOR COURT  
DOCKET NO. 215-2022-CV-00014  
Plaintiff,


v.

**TOWN OF LISBON, and  
NEW HAMPSHIRE DEPARTMENT OF JUSTICE,  
Defendants.****EX PARTE MOTION TO SEAL**

215-2022-CV-00014

Granted


Honorable Lawrence A. MacLeod, Jr.  
January 21, 2022**Clerk's Notice of Decision  
Document Sent to Parties  
on 01/24/2022**

NOW COMES the Plaintiff,  by and through his counsel, Cooper Cargill Chant, P.A., and hereby moves that this Court seal the docket and all pleadings in this matter, and in support thereof submits as follows:

1. This action is being filed pursuant to RSA 105:13-d, to protect the Plaintiff's State and Federal Constitutional rights, and to remove his name from the so-called Exculpatory Evidence Schedule (also known as the "Laurie List").
2. The Plaintiff is concerned that publicly having his name as plaintiff will undercut any relief obtained in this matter, and will further jeopardize his ability to obtain future employment in the criminal justice and policing field – even if he is fully vindicated in this matter.
3. When determining whether to seal a case, "the burden of proof rests with the party seeking closure...to demonstrate with specificity that there is some overriding consideration or special circumstance, that is, a sufficiently compelling interest, which outweighs the public's right of access to those records." *In re Keene Sentinel*, 136 N.H. 121, 128 (1992) (citation omitted).



True Copy Attest

  
David P. Carlson, Clerk of Court  
February 4, 2022

4. The plaintiffs' interest in having this lawsuit be filed under seal, while his Constitutional rights are vindicated, is a compelling interest that outweighs the right of the public's right of access to this litigation's docket.

The WHEREFORE, the Plaintiff respectfully requests that this Court:

- A. Seal the Docket and all pleadings in this matter, until further order of this Court; and  
B. Grant such further relief as is just and equitable.

Respectfully submitted,

**PLAINTIFF,**

[REDACTED],

By His Attorneys,

COOPER CARGILL CHANT, P.A.

/s/ Christopher T. Meier

Dated: September 2, 2021

---

Christopher T. Meier, Bar ID # 17136  
2935 White Mountain Highway  
North Conway, New Hampshire 03860  
Tel: (603) 356-5439  
Fax: (603) 356-7975  
Email: [cmeier@coopercargillchant.com](mailto:cmeier@coopercargillchant.com)



True Copy Attest

*[Handwritten signature]*

David P. Carlson, Clerk of Court

February 4, 2022